

ID: CCA_2013041815172654

Number: **201319018**

Office:

Release Date: 5/10/2013

UILC: 1001.00-00

From:

Sent: Thursday, April 18, 2013 3:17:30 PM

To:

Cc:

Subject: Section 1001

to confirm our conversation earlier today, we are of the opinion that taxpayer's amount realized on the sale of its receivables should not be increased by the amount of D2 liabilities, which it did not include in establishing basis. Section 1.1001-2(a)(3) of the regulations provides that if a liability is incurred by reason of the acquisition of property, and that liability was not taken into account in determining the taxpayer's basis, then that liability is not taken into account for purposes of amount realized.